

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

SHEILA BELL and JOSHUA BELL,

Plaintiffs,

v.

SANTHAN MANTHIRI and 9121-5848  
QUEBEC INC, d/b/a ADVANCE FREIGHT  
SERVICES,

Defendants.

Civil Action No.: 9:25-cv-04788-RMG

**DEFENDANTS' INITIAL DISCLOSURES  
PURSUANT TO RULE 26(A)(1)**

Pursuant to Fed. R. of Civ. P. Rule 26(a)(1) and the Court's scheduling order, Defendants do hereby make the following initial disclosures:

- i. The name, and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

**DISCLOSURE: Defendants believe the following individuals are likely to have discoverable information:**

1. **Santhan Manthiri**  
212 Place Roy  
Saint-Zotique, Quebec J0P1Z0  
Mr. Manthiri is expected to testify about the events before, leading up to, and after the accident.
2. **Sheila M Bell**  
212 Raymond Drive  
Mahomet, IL 61853  
Ms. Bell is expected to testify about the events before, leading up to, and after the accident.
3. **Joshua Bell**  
120 Secretary Trail  
Palm Coast, FL  
Mr. Bell is expected to testify about the events before, leading up to, and after the accident.
4. **Lt Michael Strauss**  
Yemassee Police Department  
101 Town Circle

**Yesmassee, South Carolina 29945**

**LT Michael Strauss is expected to testify about his observations and conversations after the subject accident.**

**5. Bajet Singh Rai**

**President of Advance Freight Services**

**124 Rue Jacques-Hetu**

**Vaudreuil-Dorion, PQ J7V 0Y9**

**Mr. Rai is expected to testify about the subject accident and employment of Mr. Manthiri.**

**Defendants reserve the right to supplement this list through discovery.**

- ii. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to supports its claims or defenses, unless the use would be solely for impeachment;

**DISCLOSURE: Defendants are in possession of driver vehicle inspection reports, Defendant Manthiri's human resources file, driver/vehicle examination report, driving history, and applicable declarations pages.**

- iii. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

**DISCLOSURE: None at this time.**

- iv. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**DISCLOSURE: None at this time.**

**WILLSON JONES CARTER & BAXLEY, P.A.**

s/ Dana Maurizio Klingener

Dana M. Klingener, FED ID No.: 13414

4922 O'Hear Avenue, Suite 301

North Charleston, SC 29405

Telephone: (843) 284-1096

Facsimile: (843) 606-3300

[dmklingener@wjcblaw.com](mailto:dmklingener@wjcblaw.com)

**ATTORNEYS FOR DEFENDANTS**

July 25, 2025

North Charleston, South Carolina